

RRutkowski.txt

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Sent: Friday, February 25, 2005 11:58 AM
To: Torres, Francine
Cc: president@whitehouse.gov%inter2; sf.nancy@mail.house.gov%inter2
Subject: Pasture requirements for organic production

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Dear Administrator:

What does the "organic" label mean to you? If you're like most consumers at supermarkets, the label likely means that the meat or dairy item includes products from animals who were fed a healthful diet and allowed to graze on pasture.

A growing number of "organic" companies, however, are playing word games not only with your definition, but also with the organic rules themselves.

I strongly support the pasture requirements for organic production.

Specifically, several organic dairies are loosely interpreting the "access to pasture" rule that's part of the U.S. Department of Agriculture's National Organic Program regulations—a list of policies that producers must follow to have the USDA Certified Organic label on their products. The rule clearly states under Livestock Living Conditions that ruminants must have "access to pasture..." Ruminants are animals such as cattle, sheep, and goats. However, the rule has a caveat allowing "temporary" confinement of ruminants for a variety of reasons, such as bad weather or to prevent the spread of disease.

Certain companies appear to be interpreting this "temporary" clause as permission for permanent confinement, so that the animals spend most of their lives indoors or on drylots, areas which are devoid of vegetation.

A Chicago Tribune reporter recently wrote about how one producer, Aurora Organic Dairy, has cows on drylots instead of pasture. The operation, based outside Denver, has more than 5,000 cows confined to pens. When Aurora's president and chief organic officer was questioned about the lack of pasture access, he apparently responded by saying he wants to make organic milk more affordable for American consumers.

But economics and the organic label are two different things. Consumers have repeatedly shown they will pay more for organic products, and clearly good animal husbandry skills, including access to pasture, are part of consumers' organic expectations. What's more, any shift toward the corporate model of agriculture will only perpetuate the industrialization of what once was a niche organic market with benefits for small, family farmers and animals; this shift does a disservice to the pioneers and advocates of the organic movement. Consumers who assume they are buying a superior product because it is labeled 'organic' will be fooled into supporting in an agricultural scheme that is one step away from a CAFO.

Following the Tribune's report, Cornucopia Institute filed a formal complaint to the USDA's National Organic Program, asking it to initiate an official government inquiry. The institute is also investigating other "organic" operations in Idaho and California.

Again, I strongly support the pasture requirements for organic production, as recommended by the National Organic Standards Board. (The board's recommendations, which can be seen below, were issued following the complaint filed by the Cornucopia

Institute.)

Support the recommendations from the National Organic Standards Board Livestock Committee from February 1, regarding pasture requirements

That pasture is good for the health and welfare of cows and other ruminants, and it should not be dropped as a requirement from the organic standards

That this requirement should be more enforced by the USDA.

Below are the draft guidelines released for public comment. The NOSB Livestock Committee recommends the following:

1. Organic System Plan

Ruminant livestock shall graze pasture during the months of the year when pasture can provide edible forage. The grazed feed must provide a significant portion of the total feed requirements. The Organic System Plan shall include a timeline showing how the producer will work to maximize the pasture component of total feed used in the farm system. For livestock operations with ruminant animals, the operation's Organic System Plan shall describe: a) the amount of pasture provided per animal; b) the average amount of time animals are grazed on a daily basis; c) the portion of the total feed requirement that will be provided from pasture; d) circumstances under which animals will be temporarily confined; and e) the records that are maintained to demonstrate compliance with pasture requirements.

2. Temporary Confinement

Temporary confinement means the period of time when ruminant livestock are denied pasture. The length of temporary confinement will vary according to the conditions on which it is based (such as the duration of inclement weather), and instances of temporary confinement shall be the minimum time necessary. In no case shall temporary confinement be allowed as a continuous production system. All instances of temporary confinement shall be documented in the Organic System Plan and in records maintained by the operation.

Temporary confinement is allowed only in the following situations:

During periods of inclement weather, such as severe weather occurring over a period of a few days during the grazing season;

Conditions under which the health, safety, or well-being of an individual animal could be jeopardized, including to restore the health of an individual animal or to prevent the spread of disease from an infected animal to other animals;

To protect soil or water quality; or

During a stage of production. [For ruminants, a "stage of production" that warrants temporary confinement from pasture include: a) birthing; b) dairy animals up to 6 months of age; and c) beef animals during the final finishing stage, not to exceed 120 days. Lactation of dairy animals is not a stage of production under which animals may be denied pasture for grazing.]

Thank you for the opportunity to bring these remarks to your attention at this critical time.

Mindful of the enormous responsibilities which stand before you, I am,

Yours sincerely,
Robert E. Rutkowski

cc:

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